

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

LIANG YANG, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

TRUST FOR ADVISED PORTFOLIOS,
INFINITY Q CAPITAL MANAGEMENT LLC,
CHRISTOPHER E. KASHMERICK, JOHN C.
CHRYSTAL, ALBERT J. DIULIO, S.J., HARRY
E. RESIS, RUSSELL B. SIMON, LEONARD
POTTER, and JAMES VELISSARIS,

Defendants.

No. 1:21-cv-01047-FB-RLM

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

NOTICE IS HEREBY GIVEN THAT Proposed Lead Plaintiff, the Palm Beach Investor Group (“Movants”) will move this Court, before the Honorable Frederic Block, United States District Judge, on such date as the Court will determine, for the entry of an Order: (1) consolidating the related actions pursuant to Fed. R. Civ. P. 42(a); (2) appointing Movants as Lead Plaintiff in the above-captioned action pursuant to the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); (3) approving Movants’ selection of Wolf Haldenstein Adler Freeman & Herz LLP to serve as Lead Counsel for the Class; and (4) granting such other and further relief as the Court may deem just and proper.

This Motion is made pursuant to the statutory deadline set forth in 15 U.S.C. § 78u-4(a)(3)(A)(i)(II). Movants request excusal from this Court’s pre-motion conference and packet filing rules as all other potential movants that may also seek appointment are unknown at this time.

This Motion is supported by the accompanying Memorandum of Law; the accompanying declaration of Matthew M. Guiney and the exhibits attached thereto; the pleadings herein; and any such other written and/or oral argument as may be permitted by the Court.

Dated: April 27, 2021

RESPECTFULLY SUBMITTED,

s/ Matthew M. Guiney
Matthew M. Guiney
Kevin G. Cooper
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